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16 17	Attorneys for Defendant Otto Trucking LLC				
	UNITED STATES DISTRICT COURT				
18	NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION				
19		Case No. 3:17-cv-00939-WHA			
20	Plaintiff,	DECLARATION OF HONG-AN VU IN			
21		SUPPORT OF DEFENDANT OTTO TRUCKING'S ADMINISTRATIVE			
22	V. Uhar Tachnologies Inc.: Ottomotto I I C. Otto	MOTION TO FILE UNDER SEAL PORTIONS OF ITS MOTION TO			
23	Uber Technologies, Inc.; Ottomotto LLC; Otto Trucking LLC,	COMPEL Construction F. 15th Floor			
24	Defendants.	Courtroom: F, 15th Floor Judge: Honorable Jacqueline S. Corley Trial Date: October 10, 2017			
25		Filed/Lodged Concurrently with:			
26		Admin. Mtn. to File Documents Under Seal [Proposed] Order Redected Unreducted Versions			
27		3. Redacted/Unredacted Versions4. Proof of Service			
28					

I, Hong-An Vu, declare as follows:

- 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC ("Otto Trucking"). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking's Administrative Motion to File Under Seal Portions of its Motion to Compel (the "Motion").
- 2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Letter Brief re Motion to Compel	Highlighted portions
Vu Declaration	Highlighted portions
Exhibit 3 to Vu Declaration	Entire document
Exhibit 4 to Vu Declaration	Entire document
Exhibit 5 to Vu Declaration	Entire document
Exhibit 6 to Vu Declaration	Entire document
Exhibit 7 to Vu Declaration	Entire document
Exhibit 8 to Vu Declaration	Highlighted portions
Exhibit 9 to Vu Declaration	Highlighted portions
Exhibit 11 to Vu Declaration	Entire document
Exhibit 12 to Vu Declaration	Entire document
Exhibit 13 to Vu Declaration	Entire document
Exhibit 14 to Vu Declaration	Entire document
Exhibit15 to Vu Declaration	Entire document
Exhibit 16 to Vu Declaration	Highlighted portions
Exhibit 17 to Vu Declaration	Highlighted portions

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- 3. The above referenced documents and portions of documents contain information designated by Plaintiff Waymo LLC as either Highly Confidential—Attorneys' Eyes Only" or "Confidential" under the terms of the parties' protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in these documents.
- 4. Otto Trucking anticipates that Waymo will file a declaration in accordance with Local Rule 79-5.
- 5. Otto Trucking's request to seal is narrowly tailored to those portions of the motion's supporting documents that merit sealing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 23rd day of August, 2017 in Los Angeles, California.

/s/ Hong-An Vu Hong-An Vu